

# **EXHIBIT E**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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BOARHEAD FARM  
AGREEMENT GROUP,

Plaintiff,

v.

ADVANCED ENVIRONMENTAL  
TECHNOLOGY CORPORATION, et al.,

Defendants

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Civil Action No. 02-CV-3830

**DECLARATION OF GLENN A. HARRIS**

GLENN A. HARRIS, ESQUIRE hereby declares and says:

1. I am a member of the law firm of Ballard Spahr Andrews & Ingersoll, LLP, and counsel for Plaintiff Boarhead Farm Agreement Group (the "Agreement Group") in the above-captioned matter. I submit this certification in support of Plaintiff Boarhead Farm Agreement Group's Motion To Compel Defendant Carpenter Technology Corporation To Respond To Plaintiff's Discovery Requests And For Sanctions.

2. On February 16, 2005 I sent an email to Lynn Wright, counsel for Carpenter Technology Corporation ("Carpenter"), pointing out that Carpenter's time to comply with this Court's January 25, 2005 Order had expired, and asking Carpenter's intention in that regard. On that day I received back from Ms. Wright the attached email promising that I would have in my hand Carpenter's responses to the Agreement Group's discovery requests by February 21, 2005 (President's Day). A copy of this email correspondence is attached to Plaintiff's Motion as "Exhibit D."

3. I have never received any such responses. On February 25, 2005 I left a voicemail for Ms. Wright in which I stated that I needed to hear from her immediately, in the absence of which the Agreement Group would apply to this Court for relief. I have not heard from Ms Wright.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 3, 2005

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/s/  
Glenn A. Harris, Esquire